

9484.1988(03)

SURFACE IMPOUNDMENT SAMPLING PLAN FOR HOLLOMAN AIR FORCE BASE

OFFICE OF SOLID WASTE AND EMERGENCY RESPONSE

JUN 20 1988

General Roy Goodwin  
Director, Engineering Services  
HQ TAC/DE  
Langley AFB, Virginia 23665-5001

Dear General Goodwin:

The purpose of this letter is to inform you of the Agency's decision regarding the outstanding sampling issues concerning the draft delisting petition for Holloman Air Force Base (No. D0660) to exclude from regulation as hazardous, the wastes contained in seven on-site surface impoundments, a drainage ditch, and two lakes. This letter also addresses ground-water monitoring data and other delisting information requirements.

As discussed in our October 14, 1987 letter, we have evaluated the Air Force's request to reduce the number of samples to be collected for analysis. We agree that the large size and volume of the impoundments, drainage ditch, and lakes in question warrant a departure from standard delisting sampling procedures. The sampling plans for the impoundments and lakes should have several components. We will require an in-depth characterization of the impoundments (labeled A through G) because the history of waste discharge to the impoundments is unclear and not completely documented. For the ditch that drains impoundment wastes to Lake Holloman, you should demonstrate that the soils in and around the ditch do not contain contaminated residues or soils that pose a threat to the environment. For Lakes Holloman and Stinky, we are concerned with understanding the compositional nature of the hazardous constituent-bearing sludges and liquids and the deposition pattern of these residues. The sampling plan, therefore, should focus on characterizing soils and liquids at key locations likely to represent the greatest concentrations of contamination that might exist in the soils, sludges, and liquids associated with the units. The sampling required for each area is

RO 13201

discussed below.

### Surface Impoundments

Holloman submitted analytical data that demonstrate that the first two impoundments are known to contain concentrations of some toxic constituents which exceed levels of concern used in delisting decision making. As a result, we cannot delist these impoundments unless you demonstrate that the

impoundments C through G, we will review the data and identify those acres which do not show hazardous constituents at levels of concern. These acres will not have to be tested further. Those acres which do show hazardous constituents at levels of concern will have to be tested using the protocol outlined previously for impoundments A and B (that is, 15 grabs per acre, from an off-set fixed grid sampling array, with every five samples composited into one sample).

### Drainage Ditch

For the ditch that links the impoundment network to Lake Holloman, we will require that you characterize the soils and residues associated with this trench. However, we cannot detail the minimum required sampling until you send us the following information:

- o Dimensions of the ditch (length, width, and depth);
- o Flow rate of material through the ditch;
- o Likelihood or documented cases of overflow; and
- o Likelihood or documented cases of the ditch drying out.

### Lakes Holloman and Stinky

For Lakes Holloman and Stinky, as discussed previously, the sampling plan will be dependent on the size and nature of the lakes. Because we do not have sufficient information describing the dimensions of the lakes, we are unable to suggest a sampling plan that will adequately characterize the waste in the lakes. Therefore, please send us descriptions and diagrams of the lakes so that we can suggest an appropriate sampling plan, including:

- o Approximate length of the perimeter of the lakes.
- o The distance from the influent point to points across the lakes, including all effluent points.
- o Positions of any past or present access roads that lead to Lakes Holloman and/or Stinky.
- o Positions of both the influent area to Lake Holloman and outfall to Lake Stinky.
- o The distance from Lake Stinky to the nearest well used as a water supply (for human or livestock consumption).
- o The location of any outfalls from Lake Stinky to any other surface waters or publicly-owned treatment works (POTW).

This information will provide useful additional information about the past and present impact that your petitioned wastes have had on the underlying aquifer. Your petition will not be considered complete without this information. Further, evidence that the units have contaminated the underlying ground-water aquifers at concentrations which exceed levels of concern used in delisting decision making can be used as a basis for denial if a formal petition is submitted to the Agency.

#### Other Information Requirements

The information that you submitted on November 11, 1986 does not contain all of the information needed for a complete petition. EPA has developed a guidance document, "Petitions to Delist Hazardous Wastes -- A Guidance Manual" (NTIS# PB85-194488), that explains the information that is needed for a complete petition. This manual can be ordered through NTIS at 5285 Port Royal Road, Springfield, VA 22161, (703) 487-4650.

I hope that this letter has clarified the sampling needed to satisfy our petition requirements. If you have any questions about these or any of the other information requirements, please call Kevin Palmer of Science Applications International Corporation (SAIC), (703) 821-4630, our consultant assisting in the review of your petition, or Terry Grist of my staff at (202)

382-4782.

Attachments

Sincerely,

Original Document signed

Terry Grogan, Chief  
Variances Section

cc: Terry Boone, HAFB  
Lt. Col. Warren Hull, DOD Liaison to EPA  
Kevin Palmer, EPA  
Jim Kent, EPA  
Terry Grist, EPA  
Lee Haze, Region VI  
Sam Becker, Region VI  
Robert Regis, Region VI  
Court Fessmeyer, Region VI  
Richard Mitzelfelt, NMHED  
Richard Sanderson, Office of Federal Activities

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FIGURE 1. EXAMPLE OF SAMPLING AND COMPOSITING FOR IMPOUNDMENTS  
A AND B

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FIGURE 3. GENERAL REPRESENTATION OF SAMPLING PLAN FOR LAKE  
HOLLOMAN

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